

Statement of Basis of the Federal Operating Permit

ETC Texas Pipeline, Ltd.

Site Name: La Grange Gas Processing Plant
Physical Location: 7307 N US Highway 77
Nearest City: La Grange
County: Fayette

Permit Number: O3098
Project Type: Minor Revision

The North American Industry Classification System (NAICS) Code: 211112
NAICS Name: Natural Gas Liquid Extraction

This Statement of Basis sets forth the legal and factual basis for the draft changes to the permit conditions resulting from the minor revision project in accordance with 30 TAC §122.201(a)(4). The applicant has submitted an application for a minor permit revision per §§ 122.215-217. This document may include the following information:

- A description of the facility/area process description;
- A description of the revision project;
- A basis for applying permit shields;
- A list of the federal regulatory applicability determinations;
- A table listing the determination of applicable requirements;
- A list of the New Source Review Requirements;
- The rationale for periodic monitoring methods selected;
- The rationale for compliance assurance methods selected;
- A compliance status; and
- A list of available unit attribute forms.

Prepared on: August 22, 2019

Operating Permit Basis of Determination

Description of Revisions

Updated area wide terms and conditions; added new units DEHY-1 with 40 CFR 63, Subpart HH requirements, and EDCOMP-2 & FUG-OOOOa with 40 CFR 60, Subpart OOOOa requirements; and added compliance assurance monitoring (CAM) requirements to AMINE, and DEHY-1 under standard permit 33577, and added CAM requirements to C-V-1 under PBR 106.352.

Permit Area Process Description

The La Grange Gas Processing Plant is a site that consists of two separate natural gas processing plants, the La Grange Plant (La Grange) and Chisholm Plant (Chisholm). These plants are considered collectively as one regulated entity for Title V permitting purposes, but facilities at each plant are operated separately.

The La Grange Plant is a cryogenic natural gas processing and condensate stabilization plant. The plant processes field gas into three primary products: (1) lean, dry residue natural gas, (2) a Y-Grade product, which consists of ethane and heavier gas liquids (NGL), and (3) a stabilized condensate product. The plant consists of natural gas separation, treating, molecular sieve dehydration, stabilization, cryogenic processing, compression, and ancillary equipment. The current project will add triethylene glycol T(TEG) dehydration equipment to the plant. The cryogenic processing unit of the plant has a capacity of up to 220 million standard cubic feet per day (MMscf/d) of gas.

The Chisholm Plant is a cryogenic natural gas processing plant that processes field gas into two products: (1) lean, dry residue natural gas, and (2) Y-Grade product. The plant consists of natural gas treating, molecular sieve dehydration, cryogenic processing, compression, and ancillary equipment. The cryogenic processing unit of the plant has a capacity of up to 120 MMscf/d of gas.

FOPs at Site

The "application area" consists of the emission units and that portion of the site included in the application and this permit. Multiple FOPs may be issued to a site in accordance with 30 TAC § 122.201(e). When there is only one area for the site, then the application information and permit will include all units at the site. Additional FOPs that exist at the site, if any, are listed below.

Additional FOPs: None

Major Source Pollutants

The table below specifies the pollutants for which the site is a major source:

| | |
|------------------|---------|
| Major Pollutants | NOX, CO |
|------------------|---------|

Reading State of Texas's Federal Operating Permit

The Title V Federal Operating Permit (FOP) lists all state and federal air emission regulations and New Source Review (NSR) authorizations (collectively known as "applicable requirements") that apply at a particular site or permit area (in the event a site has multiple FOPs). **The FOP does not authorize new emissions or new construction activities.** The FOP begins with an introductory page which is common to all Title V permits. This page gives the details of the company, states the authority of the issuing agency, requires the company to operate in accordance with this permit and 30 Texas Administrative Code (TAC) Chapter 122, requires adherence with NSR requirements of 30 TAC Chapter 116, and finally indicates the permit number and the issuance date.

This is followed by the table of contents, which is generally composed of the following elements. Not all permits will have all of the elements.

- General Terms and Conditions
- Special Terms and Conditions
 - Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting
 - Additional Monitoring Requirements
 - New Source Review Authorization Requirements
 - Compliance Requirements
 - Protection of Stratosphere Ozone
 - Permit Location
 - Permit Shield (30 TAC § 122.148)
- Attachments
 - Applicable Requirements Summary
 - Unit Summary
 - Applicable Requirements Summary
 - Additional Monitoring Requirements
 - Permit Shield
 - New Source Review Authorization References
 - Compliance Plan
 - Alternative Requirements
- Appendix A
 - Acronym list

General Terms and Conditions

The General Terms and Conditions are the same and appear in all permits. The first paragraph lists the specific citations for 30 TAC Chapter 122 requirements that apply to all Title V permit holders. The second paragraph describes the requirements for record retention. The third paragraph provides details for voiding the permit, if applicable. The fourth paragraph states that the permit holder shall comply with the requirements of 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit. The fifth paragraph provides details on submission of reports required by the permit.

Special Terms and Conditions

Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting. The TCEQ has designated certain applicable requirements as site-wide requirements. A site-wide requirement is a requirement that applies uniformly to all the units or activities at the site. Units with only site-wide requirements are addressed on Form OP-REQ1 and are not required to be listed separately on a OP-UA Form or Form OP-SUM. Form OP-SUM must list all units addressed in the application and provide identifying information, applicable OP-UA Forms, and preconstruction authorizations. The various OP-UA Forms provide the characteristics of each unit from which applicable requirements are established. Some exceptions exist as a few units may have both site-wide requirements and unit specific requirements.

Other conditions. The other entries under special terms and conditions are in general terms referring to compliance with the more detailed data listed in the attachments.

Attachments

Applicable Requirements Summary. The first attachment, the Applicable Requirements Summary, has two tables, addressing unit specific requirements. The first table, the Unit Summary, includes a list of units with applicable requirements, the unit type, the applicable regulation, and the requirement driver. The intent of the requirement driver is to inform the reader that a given unit may have several different operating scenarios and the differences between those operating scenarios.

The applicable requirements summary table provides the detailed citations of the rules that apply to the various units. For each unit and operating scenario, there is an added modifier called the “index number,” detailed citations specifying

monitoring and testing requirements, recordkeeping requirements, and reporting requirements. The data for this table are based on data supplied by the applicant on the OP-SUM and various OP-UA forms.

Additional Monitoring Requirement. The next attachment includes additional monitoring the applicant must perform to ensure compliance with the applicable standard. Compliance assurance monitoring (CAM) is often required to provide a reasonable assurance of compliance with applicable emission limitations/standards for large emission units that use control devices to achieve compliance with applicant requirements. When necessary, periodic monitoring (PM) requirements are specified for certain parameters (i.e. feed rates, flow rates, temperature, fuel type and consumption, etc.) to determine if a term and condition or emission unit is operating within specified limits to control emissions. These additional monitoring approaches may be required for two reasons. First, the applicable rules do not adequately specify monitoring requirements (exception- Maximum Achievable Control Technology Standards (MACTs) generally have sufficient monitoring), and second, monitoring may be required to fill gaps in the monitoring requirements of certain applicable requirements. In situations where the NSR permit is the applicable requirement requiring extra monitoring for a specific emission unit, the preferred solution is to have the monitoring requirements in the NSR permit updated so that all NSR requirements are consolidated in the NSR permit.

Permit Shield. A permit may or may not have a permit shield, depending on whether an applicant has applied for, and justified the granting of, a permit shield. A permit shield is a special condition included in the permit document stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirement(s) or specified applicable state-only requirement(s).

New Source Review Authorization References. All activities which are related to emissions in the state of Texas must have a NSR authorization prior to beginning construction. This section lists all units in the permit and the NSR authorization that allowed the unit to be constructed or modified. Units that do not have unit specific applicable requirements other than the NSR authorization do not need to be listed in this attachment. While NSR permits are not physically a part of the Title V permit, they are legally incorporated into the Title V permit by reference. Those NSR permits whose emissions exceed certain PSD/NA thresholds must also undergo a Federal review of federally regulated pollutants in addition to review for state regulated pollutants.

Compliance Plan. A permit may have a compliance schedule attachment for listing corrective actions plans for any emission unit that is out of compliance with an applicable requirement.

Alternative Requirements. This attachment will list any alternative monitoring plans or alternative means of compliance for applicable requirements that have been approved by the EPA Administrator and/or the TCEQ Executive Director.

Appendix A

Acronym list. This attachment lists the common acronyms used when discussing the FOPs.

Stationary vents subject to 30 TAC Chapter 111, Subchapter A, § 111.111(a)(1)(B) addressed in the Special Terms and Conditions

The site contains stationary vents with a flowrate less than 100,000 actual cubic feet per minute (acfm) and constructed after January 31, 1972 which are limited, over a six-minute average, to 20% opacity as required by 30 TAC § 111.111(a)(1)(B). As a site may have a large number of stationary vents that fall into this category, they are not required to be listed individually in the permit's Applicable Requirement Summary. This is consistent with EPA's White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995, that states that requirements that apply identically to emission units at a site can be treated on a generic basis such as source-wide opacity limits.

Periodic monitoring is specified in Special Term and Condition 3 for stationary vents subject to 30 TAC § 111.111(a)(1)(B) to verify compliance with the 20% opacity limit. These vents are not expected to produce visible emissions during normal operation. The TCEQ evaluated the probability of these sources violating the opacity standards and determined that there is a very low potential that an opacity standard would be exceeded. It was determined that continuous monitoring for these sources is not warranted as there would be very limited environmental benefit in continuously monitoring sources that have a low potential to produce visible emissions. Therefore, the TCEQ set the visible observation monitoring frequency for these sources to once per calendar quarter.

The TCEQ has exempted vents that are not capable of producing visible emissions from periodic monitoring requirements. These vents include sources of colorless VOCs, non-fuming liquids, and other materials that cannot produce emissions that obstruct the transmission of light. Passive ventilation vents, such as plumbing vents, are also included in this category. Since this category of vents are not capable of producing opacity due to the physical or chemical characteristics of the emission source, periodic monitoring is not required as it would not yield any additional data to assure compliance with the 20% opacity standard of 30 TAC § 111.111(a)(1)(B).

In the event that visible emissions are detected, either through the quarterly observation or other credible evidence, such as observations from company personnel, the permit holder shall either report a deviation or perform a Test Method 9 observation to determine the opacity consistent with the 6-minute averaging time specified in 30 TAC § 111.111(a)(1)(B). An additional provision is included to monitor combustion sources more frequently than quarterly if alternate fuels are burned for periods greater than 24 consecutive hours. This will address possible emissions that may arise when switching fuel types.

Federal Regulatory Applicability Determinations

The following chart summarizes the applicability of the principal air pollution regulatory programs to the permit area:

| Regulatory Program | Applicability (Yes/No) |
|---|-----------------------------------|
| Prevention of Significant Deterioration (PSD) | No |
| Nonattainment New Source Review (NNSR) | No |
| Minor NSR | Yes |
| 40 CFR Part 60 - New Source Performance Standards | Yes |
| 40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPs) | No |
| 40 CFR Part 63 - NESHAPs for Source Categories | Yes |
| Title IV (Acid Rain) of the Clean Air Act (CAA) | No |
| Title V (Federal Operating Permits) of the CAA | Yes |
| Title VI (Stratospheric Ozone Protection) of the CAA | Yes |
| CSAPR (Cross-State Air Pollution Rule) | No |
| Federal Implementation Plan for Regional Haze (Texas SO ₂ Trading Program) | No |

Basis for Applying Permit Shields

An operating permit applicant has the opportunity to specifically request a permit shield to document that specific applicable requirements do not apply to emission units in the permit. A permit shield is a special condition stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements. A permit shield has been requested in the

application for specific emission units. For the permit shield requests that have been approved, the basis of determination for regulations that the owner/operator need not comply with are located in the "Permit Shield" attachment of the permit.

Insignificant Activities

In general, units not meeting the criteria for inclusion on either Form OP-SUM or Form OP-REQ1 are not required to be addressed in the operating permit application. Examples of these types of units include, but are not limited to, the following:

1. Office activities such as photocopying, blueprint copying, and photographic processes.
2. Sanitary sewage collection and treatment facilities other than those used to incinerate wastewater treatment plant sludge. Stacks or vents for sanitary sewer plumbing traps are also included.
3. Food preparation facilities including, but not limited to, restaurants and cafeterias used for preparing food or beverages primarily for consumption on the premises.
4. Outdoor barbecue pits, campfires, and fireplaces.
5. Laundry dryers, extractors, and tumblers processing bedding, clothing, or other fabric items generated primarily at the premises. This does not include emissions from dry cleaning systems using perchloroethylene or petroleum solvents.
6. Facilities storing only dry, sweet natural gas, including natural gas pressure regulator vents.
7. Any air separation or other industrial gas production, storage, or packaging facility. Industrial gases, for purposes of this list, include only oxygen, nitrogen, helium, neon, argon, krypton, and xenon.
8. Storage and handling of sealed portable containers, cylinders, or sealed drums.
9. Vehicle exhaust from maintenance or repair shops.
10. Storage and use of non-VOC products or equipment for maintaining motor vehicles operated at the site (including but not limited to, antifreeze and fuel additives).
11. Air contaminant detectors and recorders, combustion controllers and shut-off devices, product analyzers, laboratory analyzers, continuous emissions monitors, other analyzers and monitors, and emissions associated with sampling activities. Exception to this category includes sampling activities that are deemed fugitive emissions and under a regulatory leak detection and repair program.
12. Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including but not limited to, assorted vacuum producing devices and laboratory fume hoods.
13. Steam vents, steam leaks, and steam safety relief valves, provided the steam (or boiler feedwater) has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
14. Storage of water that has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
15. Well cellars.
16. Fire or emergency response equipment and training, including but not limited to, use of fire control equipment including equipment testing and training, and open burning of materials or fuels associated with firefighting training.
17. Crucible or pot furnaces with a brim full capacity of less than 450 cubic inches of any molten metal.
18. Equipment used exclusively for the melting or application of wax.
19. All closed tumblers used for the cleaning or deburring of metal products without abrasive blasting, and all open tumblers with a batch capacity of 1,000 lbs. or less.
20. Shell core and shell mold manufacturing machines.
21. Sand or investment molds with a capacity of 100 lbs. or less used for the casting of metals;
22. Equipment used for inspection of metal products.
23. Equipment used exclusively for rolling, forging, pressing, drawing, spinning, or extruding either hot or cold metals by some mechanical means.
24. Instrument systems utilizing air, natural gas, nitrogen, oxygen, carbon dioxide, helium, neon, argon, krypton, and xenon.
25. Battery recharging areas.
26. Brazing, soldering, or welding equipment.

Determination of Applicable Requirements

The tables below include the applicability determinations for the emission units, the index number(s) where applicable, and all relevant unit attribute information used to form the basis of the applicability determination. The unit attribute information is a description of the physical properties of an emission unit which is used to determine the requirements to which the permit holder must comply. For more information about the descriptions of the unit attributes specific Unit Attribute Forms may be viewed at www.tceq.texas.gov/permitting/air/nav/air_all_ua_forms.html.

A list of unit attribute forms is included at the end of this document. Some examples of unit attributes include construction date; product stored in a tank; boiler fuel type; etc.. Generally, multiple attributes are needed to determine the requirements for a given emission unit and index number. The table below lists these attributes in the column entitled "Basis of Determination." Attributes that demonstrate that an applicable requirement applies will be the factual basis for the specific citations in an applicable requirement that apply to a unit for that index number. The TCEQ Air Permits Division has developed flowcharts for determining applicability of state and federal regulations based on the unit attribute information in a Decision Support System (DSS). These flowcharts can be accessed via the internet at www.tceq.texas.gov/permitting/air/nav/air_supportsys.html. The Air Permits Division staff may also be contacted for assistance at (512) 239-1250.

The attributes for each unit and corresponding index number provide the basis for determining the specific legal citations in an applicable requirement that apply, including emission limitations or standards, monitoring, recordkeeping, and reporting. The rules were found to apply or not apply by using the unit attributes as answers to decision questions found in the flowcharts of the DSS. Some additional attributes indicate which legal citations of a rule apply. The legal citations that apply to each emission unit may be found in the Applicable Requirements Summary table of the draft permit. There may be some entries or rows of units and rules not found in the permit, or if the permit contains a permit shield, repeated in the permit shield area. These are sets of attributes that describe negative applicability, or; in other words, the reason why a potentially applicable requirement does not apply.

If applicability determinations have been made which differ from the available flowcharts, an explanation of the decisions involved in the applicability determination is specified in the column "Changes and Exceptions to RRT." If there were no exceptions to the DSS, then this column has been removed.

The draft permit includes all emission limitations or standards, monitoring, recordkeeping and reporting required by each applicable requirement. If an applicable requirement does not require monitoring, recordkeeping, or reporting, the word "None" will appear in the Applicable Requirements Summary table. If additional periodic monitoring is required for an applicable requirement, it will be explained in detail in the portion of this document entitled "Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected."

When attributes demonstrate that a unit is not subject to an applicable requirement, the applicant may request a permit shield for those items. The portion of this document entitled "Basis for Applying Permit Shields" specifies which units, if any, have a permit shield.

Operational Flexibility

When an emission unit has multiple operating scenarios, it will have a different index number associated with each operating condition. This means that units are permitted to operate under multiple operating conditions. The applicable requirements for each operating condition are determined by a unique set of unit attributes. For example, a tank may store two different products at different points in time. The tank may, therefore, need to comply with two distinct sets of requirements, depending on the product that is stored. Both sets of requirements are included in the permit, so that the permit holder may store either product in the tank.

Determination of Applicable Requirements

| Unit ID | Regulation | Index Number | Basis of Determination* |
|---------|--|--------------|--|
| FWP-1 | 40 CFR Part 63, Subpart ZZZZ | 63-ZZZZ-1 | <p>HAP Source = The site is an area source of hazardous air pollutants as defined in 40 CFR § 63.2</p> <p>Manufacture Date = The stationary RICE was manufactured on or after January 1, 2008.</p> <p>Brake HP = Stationary RICE with a brake HP less than 100 HP.</p> <p>Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.</p> <p>Nonindustrial Emergency Engine = Stationary RICE is not defined in 40 CFR §63.6675 as a residential emergency RICE, a commercial emergency RICE, or an institutional emergency RICE.</p> <p>Service Type = Emergency use where the RICE does not operate as specified in 40 CFR §63.6640(f)(2)(ii) and (iii) or does not operate as specified in 40 CFR §63.6640(f)(4)(ii).</p> <p>Stationary RICE Type = Compression ignition engine</p> |
| LOAD-1A | 30 TAC Chapter 115, Loading and Unloading of VOC | 115-LOAD-1A | <p>Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.</p> <p>Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.</p> <p>Product Transferred = Volatile organic compounds other than gasoline.</p> <p>Transfer Type = Only loading.</p> |
| C-FL-1 | 30 TAC Chapter 111, Visible Emissions | 111-CFL-1 | <p>Acid Gases Only = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1.</p> <p>Emergency/Upset Conditions Only = Flare is used under conditions other than emergency or upset conditions.</p> <p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p> <p>Construction Date = Newest source routing emissions to the flare began construction after January 31, 1972.</p> |
| FL-1 | 30 TAC Chapter 111, Visible Emissions | R1111 | <p>Acid Gases Only = Flare is used only as an acid gas flare as defined in 30 TAC § 101.1.</p> <p>Emergency/Upset Conditions Only = Flare is used under conditions other than emergency or upset conditions.</p> <p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p> <p>Construction Date = Newest source routing emissions to the flare began construction after January 31, 1972.</p> |
| FL-1 | 40 CFR Part 60, Subpart A | 60A | <p>Subject to 40 CFR § 60.18 = Flare is subject to 40 CFR § 60.18.</p> <p>Adhering to Heat Content Specifications = Adhering to the heat content specifications in 40 CFR § 60.18(c)(3)(ii) and the maximum tip velocity specifications in 40 CFR § 60.18(c)(4)(i)-(iii) or (c)(5).</p> <p>Flare Assist Type = Non-assisted</p> <p>Flare Exit Velocity = Flare exit velocity is less than 60 ft/s (18.3 m/sec)</p> <p>Heating Value of Gas = Heating value is less than or equal to 1000 Btu/scf (37.3 MJ/scm).</p> |
| FL-1 | 40 CFR Part 63, Subpart A | 63A | <p>Required Under 40 CFR Part 63 = Flare is not required by a Subpart under 40 CFR Part 63.</p> |
| FL-2A | 30 TAC Chapter 111, Visible Emissions | 111-FL-2A | <p>Acid Gases Only = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1.</p> <p>Emergency/Upset Conditions Only = Flare is used under conditions other than emergency or upset conditions.</p> |

| Unit ID | Regulation | Index Number | Basis of Determination* |
|---------|--------------------------------------|--------------|---|
| | | | <p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p> <p>Construction Date = Newest source routing emissions to the flare began construction after January 31, 1972.</p> |
| FL-2A | 40 CFR Part 60, Subpart A | 60-FL-2A | Subject to 40 CFR § 60.18 = Flare is not subject to 40 CFR § 60.18. |
| FL-2A | 40 CFR Part 63, Subpart A | 63-FL-2A | Required Under 40 CFR Part 63 = Flare is not required by a Subpart under 40 CFR Part 63. |
| AMINE | 30 TAC Chapter 112, Sulfur Compounds | 112-AMINE | <p>Sulfur Recovery Plant = The gas sweetening unit is not using sulfur recovery.</p> <p>Stack Height = Effective stack height greater than or equal to the standard effective stack height.</p> |
| AMINE | 40 CFR Part 60, Subpart LLL | LLL-AMINE | <p>Onshore = The sweetening unit is located onshore at a gas processing plant.</p> <p>Construction Date = On or before January 20, 1984.</p> <p>Acid Gas Vented = Acid gas is vented (acid gas is not completely reinjected into oil- or gas-bearing strata or is otherwise released into the atmosphere [burning is considered to be a release into the atmosphere]).</p> <p>Design Capacity = Design capacity is greater than or equal to 150 long tons per day.</p> |
| C-V-1 | 30 TAC Chapter 112, Sulfur Compounds | 112-CHIS | Sulfur Recovery Plant = The gas sweetening unit is not using sulfur recovery. |
| C-V-1 | 40 CFR Part 60, Subpart LLL | LLL-CHIS | <p>Onshore = The sweetening unit is located onshore at a gas processing plant.</p> <p>Construction Date = After January 20, 1984 and on or before August 23, 2011.</p> <p>Acid Gas Vented = Acid gas is vented (acid gas is not completely reinjected into oil- or gas-bearing strata or is otherwise released into the atmosphere [burning is considered to be a release into the atmosphere]).</p> <p>Design Capacity = Design capacity is less than 2 long tons/day.</p> |
| C-T-1 | 40 CFR Part 60, Subpart KKKK | 60KKKK-CT1 | <p>75% of Peak = The combustion turbine does not operate at less than 75% of peak load or at temperatures less than zero degrees F.</p> <p>Location = The turbine is not located in a noncontinental area nor in a continental area for which the Administrator has determined does not have access to natural gas and that the removal of sulfur compounds would do more environmental harm than benefit.</p> <p>Unit Type = Simple Combustion Turbine</p> <p>Construction/Modification Date = Turbine was constructed after February 18, 2005.</p> <p>SO₂ Standard = The heat input based SO₂ emission standard in § 60.4330(a)(2) or (a)(3) is being used.</p> <p>Fuel Monitoring = All fuels used are demonstrated not to exceed the potential emissions standard in § 60.4365.</p> <p>Heat Input = Turbine has a heat input at peak load of at least 10 MMBtu per hour but less than 50 MMBtu per hour.</p> <p>Turbine Use = Turbine is used for mechanical drive.</p> <p>Fuel Quality = Fuel is demonstrated not to exceed emission standard by representative fuel sampling data.</p> <p>NO_x Control = NO_x emissions are not being controlled by steam or water injection.</p> |

| Unit ID | Regulation | Index Number | Basis of Determination* |
|---------|------------------------------|--------------|---|
| | | | <p>Subject to Da = The combustion turbine is not located at an integrated gasification combined cycle electric utility steam generating unit subject to Subpart Da of Part 60.</p> <p>NOx Monitoring = Compliance is demonstrated with annual performance tests.</p> <p>Performance Test = Sulfur content of the fuel combusted in the turbine is being periodically determined.</p> <p>Service Type = Service other than emergency service, as defined in § 60.4420(i), or research and development.</p> <p>Common Steam Header = A steam header is not utilized.</p> <p>NOx Standard = The parts per million NO_x emission standard in Table 1 is being used.</p> <p>Duct Burner = The heat recovery system does not include a duct burner.</p> <p>Fuel Type = 100% natural gas.</p> |
| C-T-2 | 40 CFR Part 60, Subpart KKKK | 60KKKK-CT2 | <p>75% of Peak = The combustion turbine does not operate at less than 75% of peak load or at temperatures less than zero degrees F.</p> <p>Location = The turbine is not located in a noncontinental area nor in a continental area for which the Administrator has determined does not have access to natural gas and that the removal of sulfur compounds would do more environmental harm than benefit.</p> <p>Unit Type = Simple Combustion Turbine</p> <p>Construction/Modification Date = Turbine was constructed after February 18, 2005.</p> <p>SO₂ Standard = The heat input based SO₂ emission standard in § 60.4330(a)(2) or (a)(3) is being used.</p> <p>Fuel Monitoring = All fuels used are demonstrated not to exceed the potential emissions standard in § 60.4365.</p> <p>Heat Input = Turbine has a heat input at peak load of at least 10 MMBtu per hour but less than 50 MMBtu per hour.</p> <p>Turbine Use = Turbine is used for mechanical drive.</p> <p>Fuel Quality = Fuel is demonstrated not to exceed emission standard by representative fuel sampling data.</p> <p>NOx Control = NO_x emissions are not being controlled by steam or water injection.</p> <p>Subject to Da = The combustion turbine is not located at an integrated gasification combined cycle electric utility steam generating unit subject to Subpart Da of Part 60.</p> <p>NOx Monitoring = Compliance is demonstrated with annual performance tests.</p> <p>Performance Test = Sulfur content of the fuel combusted in the turbine is being periodically determined.</p> <p>Service Type = Service other than emergency service, as defined in § 60.4420(i), or research and development.</p> <p>Common Steam Header = A steam header is not utilized.</p> <p>NOx Standard = The parts per million NO_x emission standard in Table 1 is being used.</p> <p>Duct Burner = The heat recovery system does not include a duct burner.</p> <p>Fuel Type = 100% natural gas.</p> |
| T-1 | 40 CFR Part 60, Subpart GG | 60GG | <p>NOx Control Method = No NO_x control method is used.</p> <p>Peak Load Heat Input = Heat Input is greater or equal to 10 MMBtu/hr (10.7 GJ/hr) and less than or equal to 100 MMBtu/hr (107.2 GJ/hr).</p> <p>Construction/Modification Date = After October 3, 1977 and on or before January 27, 1982.</p> <p>NOx Allowance = The owner or operator is not electing to use a NO_x allowance in determining emission limits in 40 CFR § 60.332(a).</p> |

| Unit ID | Regulation | Index Number | Basis of Determination* |
|---------|----------------------------|--------------|---|
| | | | <p>NOx Monitoring Method = No continuous monitoring system is used.</p> <p>Sulfur Content = Compliance is demonstrated by determining the sulfur content of the fuel.</p> <p>Turbine Cycle = Unit does not recover heat from the gas turbine exhaust to preheat inlet combustion air; or to heat water or generate steam.</p> <p>Fuel Type Fired = Natural gas meeting the definition in § 60.331(u).</p> <p>Subpart GG Service Type = Type of service other than research and development, emergency, military or electrical utility generation.</p> <p>Fuel Supply = Stationary gas turbine is supplied its fuel without intermediate bulk storage.</p> <p>Fuel Monitoring Schedule = Previously approved custom fuel monitoring schedule.</p> |
| T-2 | 40 CFR Part 60, Subpart GG | 60GG | <p>NOx Control Method = No NO_x control method is used.</p> <p>Peak Load Heat Input = Heat Input is greater or equal to 10 MMBtu/hr (10.7 GJ/hr) and less than or equal to 100 MMBtu/hr (107.2 GJ/hr).</p> <p>Construction/Modification Date = After October 3, 1977 and on or before January 27, 1982.</p> <p>NOx Allowance = The owner or operator is not electing to use a NO_x allowance in determining emission limits in 40 CFR § 60.332(a).</p> <p>NOx Monitoring Method = No continuous monitoring system is used.</p> <p>Sulfur Content = Compliance is demonstrated by determining the sulfur content of the fuel.</p> <p>Turbine Cycle = Unit does not recover heat from the gas turbine exhaust to preheat inlet combustion air; or to heat water or generate steam.</p> <p>Fuel Type Fired = Natural gas meeting the definition in § 60.331(u).</p> <p>Subpart GG Service Type = Type of service other than research and development, emergency, military or electrical utility generation.</p> <p>Fuel Supply = Stationary gas turbine is supplied its fuel without intermediate bulk storage.</p> <p>Fuel Monitoring Schedule = Previously approved custom fuel monitoring schedule.</p> |
| T-3 | 40 CFR Part 60, Subpart GG | 60GG | <p>NOx Control Method = No NO_x control method is used.</p> <p>Peak Load Heat Input = Heat Input is greater or equal to 10 MMBtu/hr (10.7 GJ/hr) and less than or equal to 100 MMBtu/hr (107.2 GJ/hr).</p> <p>Construction/Modification Date = After October 3, 1977 and on or before January 27, 1982.</p> <p>NOx Allowance = The owner or operator is not electing to use a NO_x allowance in determining emission limits in 40 CFR § 60.332(a).</p> <p>NOx Monitoring Method = No continuous monitoring system is used.</p> <p>Sulfur Content = Compliance is demonstrated by determining the sulfur content of the fuel.</p> <p>Turbine Cycle = Unit does not recover heat from the gas turbine exhaust to preheat inlet combustion air; or to heat water or generate steam.</p> <p>Fuel Type Fired = Natural gas meeting the definition in § 60.331(u).</p> <p>Subpart GG Service Type = Type of service other than research and development, emergency, military or electrical utility generation.</p> <p>Fuel Supply = Stationary gas turbine is supplied its fuel without intermediate bulk storage.</p> |

| Unit ID | Regulation | Index Number | Basis of Determination* |
|---------|-------------------------------|--------------|--|
| | | | Fuel Monitoring Schedule = Previously approved custom fuel monitoring schedule. |
| T-4 | 40 CFR Part 60, Subpart GG | 60GG | <p>NO_x Control Method = No NO_x control method is used.</p> <p>Peak Load Heat Input = Heat Input is greater or equal to 10 MMBtu/hr (10.7 GJ/hr) and less than or equal to 100 MMBtu/hr (107.2 GJ/hr).</p> <p>Construction/Modification Date = After October 3, 1977 and on or before January 27, 1982.</p> <p>NO_x Allowance = The owner or operator is not electing to use a NO_x allowance in determining emission limits in 40 CFR § 60.332(a).</p> <p>NO_x Monitoring Method = No continuous monitoring system is used.</p> <p>Sulfur Content = Compliance is demonstrated by determining the sulfur content of the fuel.</p> <p>Turbine Cycle = Unit does not recover heat from the gas turbine exhaust to preheat inlet combustion air; or to heat water or generate steam.</p> <p>Fuel Type Fired = Natural gas meeting the definition in § 60.331(u).</p> <p>Subpart GG Service Type = Type of service other than research and development, emergency, military or electrical utility generation.</p> <p>Fuel Supply = Stationary gas turbine is supplied its fuel without intermediate bulk storage.</p> <p>Fuel Monitoring Schedule = Previously approved custom fuel monitoring schedule.</p> |
| T-5 | 40 CFR Part 60, Subpart GG | 60GG | <p>NO_x Control Method = NO_x control method other than water or steam injection or selective catalytic reduction.</p> <p>Peak Load Heat Input = Heat Input is greater or equal to 10 MMBtu/hr (10.7 GJ/hr) and less than or equal to 100 MMBtu/hr (107.2 GJ/hr).</p> <p>Construction/Modification Date = On or after October 3, 1982 and before July 8, 2004.</p> <p>NO_x Allowance = The owner or operator is not electing to use a NO_x allowance in determining emission limits in 40 CFR § 60.332(a).</p> <p>NO_x Monitoring Method = No continuous monitoring system is used.</p> <p>Sulfur Content = Compliance is demonstrated by determining the sulfur content of the fuel.</p> <p>Turbine Cycle = Unit does not recover heat from the gas turbine exhaust to preheat inlet combustion air; or to heat water or generate steam.</p> <p>Fuel Type Fired = Natural gas meeting the definition in § 60.331(u).</p> <p>Subpart GG Service Type = Type of service other than research and development, emergency, military or electrical utility generation.</p> <p>Fuel Supply = Stationary gas turbine is supplied its fuel without intermediate bulk storage.</p> <p>Fuel Monitoring Schedule = Previously approved custom fuel monitoring schedule.</p> |
| T-6 | 40 CFR Part 60, Subpart GG | 60GG | <p>NO_x Control Method = No NO_x control method is used.</p> <p>Peak Load Heat Input = Heat Input is greater or equal to 10 MMBtu/hr (10.7 GJ/hr) and less than or equal to 100 MMBtu/hr (107.2 GJ/hr).</p> <p>Construction/Modification Date = After October 3, 1977 and on or before January 27, 1982.</p> <p>NO_x Allowance = The owner or operator is not electing to use a NO_x allowance in determining emission limits in 40 CFR § 60.332(a).</p> |

| Unit ID | Regulation | Index Number | Basis of Determination* |
|---------|----------------------------|--------------|---|
| | | | <p>NOx Monitoring Method = No continuous monitoring system is used.</p> <p>Sulfur Content = Compliance is demonstrated by determining the sulfur content of the fuel.</p> <p>Turbine Cycle = Unit does not recover heat from the gas turbine exhaust to preheat inlet combustion air; or to heat water or generate steam.</p> <p>Fuel Type Fired = Natural gas meeting the definition in § 60.331(u).</p> <p>Subpart GG Service Type = Type of service other than research and development, emergency, military or electrical utility generation.</p> <p>Fuel Supply = Stationary gas turbine is supplied its fuel without intermediate bulk storage.</p> <p>Fuel Monitoring Schedule = Previously approved custom fuel monitoring schedule.</p> |
| T-7 | 40 CFR Part 60, Subpart GG | 60GG | <p>NOx Control Method = No NO_x control method is used.</p> <p>Peak Load Heat Input = Heat Input is greater or equal to 10 MMBtu/hr (10.7 GJ/hr) and less than or equal to 100 MMBtu/hr (107.2 GJ/hr).</p> <p>Construction/Modification Date = After October 3, 1977 and on or before January 27, 1982.</p> <p>NOx Allowance = The owner or operator is not electing to use a NO_x allowance in determining emission limits in 40 CFR § 60.332(a).</p> <p>NOx Monitoring Method = No continuous monitoring system is used.</p> <p>Sulfur Content = Compliance is demonstrated by determining the sulfur content of the fuel.</p> <p>Turbine Cycle = Unit does not recover heat from the gas turbine exhaust to preheat inlet combustion air; or to heat water or generate steam.</p> <p>Fuel Type Fired = Natural gas meeting the definition in § 60.331(u).</p> <p>Subpart GG Service Type = Type of service other than research and development, emergency, military or electrical utility generation.</p> <p>Fuel Supply = Stationary gas turbine is supplied its fuel without intermediate bulk storage.</p> <p>Fuel Monitoring Schedule = Previously approved custom fuel monitoring schedule.</p> |
| T-8 | 40 CFR Part 60, Subpart GG | 60GG | <p>NOx Control Method = No NO_x control method is used.</p> <p>Peak Load Heat Input = Heat Input is greater or equal to 10 MMBtu/hr (10.7 GJ/hr) and less than or equal to 100 MMBtu/hr (107.2 GJ/hr).</p> <p>Construction/Modification Date = On or after October 3, 1982 and before July 8, 2004.</p> <p>NOx Allowance = The owner or operator is not electing to use a NO_x allowance in determining emission limits in 40 CFR § 60.332(a).</p> <p>NOx Monitoring Method = No continuous monitoring system is used.</p> <p>Sulfur Content = Compliance is demonstrated by determining the sulfur content of the fuel.</p> <p>Turbine Cycle = Unit does not recover heat from the gas turbine exhaust to preheat inlet combustion air; or to heat water or generate steam.</p> <p>Fuel Type Fired = Natural gas meeting the definition in § 60.331(u).</p> <p>Subpart GG Service Type = Type of service other than research and development, emergency, military or electrical utility generation.</p> <p>Fuel Supply = Stationary gas turbine is supplied its fuel without intermediate bulk storage.</p> |

| Unit ID | Regulation | Index Number | Basis of Determination* |
|-----------|----------------------------------|----------------|---|
| | | | Fuel Monitoring Schedule = Previously approved custom fuel monitoring schedule. |
| EDCOMP-2 | 40 CFR Part 60, Subpart OOOOa | 60OOOOa | Construction/Reconstruction/Modification Date = After September 18, 2015. Affected Facility Type = Reciprocating Compressor. |
| FUG-1 | 40 CFR Part 60, Subpart KKK | 60KKK | Facility Type = Affected facility is the group of all equipment except compressors within a process unit. Heavy Liquid Service = No pump in heavy liquid service addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit. Vacuum Service = No component in vacuum service addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit. Construction/Modification Date = On or before January 20, 1984. Non-VOC or Non-Wet Gas Service = No component in non-VOC or non-wet gas service addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit. |
| FUG-OOOOA | 40 CFR Part 60, Subpart OOOOa | 60OOOOa-FUG | Construction/Reconstruction/Modification Date = After September 18, 2015. Affected Facility Type = Fugitive emissions components at a compressor station. |
| FUG-PBR1 | 40 CFR Part 60, Subpart KKK | 60KKK-ALL | SOP/GOP Index No. = OWNER/OPERATOR ASSUMES FUGITIVE CONTROL REQUIREMENTS FOR ALL COMPONENTS IN VOC SERVICE SUBJECT TO NSPS KKK WITH NO ALTERNATE CONTROL OR CONTROL DEVICE |
| HH-FUG | 40 CFR Part 63, Subpart HH | 63HH-ALL | SOP/GOP Index No. = Owner/Operator assumes standard fugitive control requirements for all components in HAP service subject to MACT HH with no alternate control or control device. |
| KKK-FUG | 40 CFR Part 60, Subpart KKK | 60KKK-ALL | SOP/GOP Index No. = OWNER/OPERATOR ASSUMES FUGITIVE CONTROL REQUIREMENTS FOR ALL COMPONENTS IN VOC SERVICE SUBJECT TO NSPS KKK WITH NO ALTERNATE CONTROL OR CONTROL DEVICE |
| LOAD-1A | 40 CFR Part 60, Subpart OOOO | 60OOOO-LOAD-1A | Affected Facility Type = Group of equipment with a process unit, other than a compressor, not subject to 40 CFR Part 60, Subparts VVa, GGG or GGGa. |
| DEHY-1 | 40 CFR Part 63, Subpart HH | 63HH-DEHY | Alternate Means of Emission Limitation (AMEL) = The EPA Administrator has not approved an alternate means of emission limitation in accordance with 40 CFR § 63.777 or no alternate has been requested. HAP Source = Stationary of source of HAPs that is not a major source as defined in 40 CFR § 63.761. Affected Source Type = Triethylene glycol (TEG) dehydration unit not located within an UA plus offset and UC boundary. Area Source Exemption = Actual average emissions of benzene from the TEG unit process vent are less than 0.90 megagrams per year. |

* - The "unit attributes" or operating conditions that determine what requirements apply

NSR Versus Title V FOP

The state of Texas has two Air permitting programs, New Source Review (NSR) and Title V Federal Operating Permits. The two programs are substantially different both in intent and permit content.

NSR is a preconstruction permitting program authorized by the Texas Clean Air Act and Title I of the Federal Clean Air Act (FCAA). The processing of these permits is governed by 30 Texas Administrative Code (TAC) Chapter 116.111. The Title V Federal Operating Program is a federal program authorized under Title V of the FCAA that has been delegated to the state of Texas to administer and is governed by 30 TAC Chapter 122. The major differences between the two permitting programs are listed in the table below:

| NSR Permit | Federal Operating Permit(FOP) |
|---|--|
| Issued Prior to new Construction or modification of an existing facility | For initial permit with application shield, can be issued after operation commences; significant revisions require approval prior to operation. |
| Authorizes air emissions | Codifies existing applicable requirements, does not authorize new emissions |
| Ensures issued permits are protective of the environment and human health by conducting a health effects review and that requirement for best available control technology (BACT) is implemented. | Applicable requirements listed in permit are used by the inspectors to ensure proper operation of the site as authorized. Ensures that adequate monitoring is in place to allow compliance determination with the FOP. |
| Up to two Public notices may be required. Opportunity for public comment and contested case hearings for some authorizations. | One public notice required. Opportunity for public comments. No contested case hearings. |
| Applies to all point source emissions in the state. | Applies to all major sources and some non-major sources identified by the EPA. |
| Applies to facilities: a portion of site or individual emission sources | One or multiple FOPs cover the entire site (consists of multiple facilities) |
| Permits include terms and conditions under which the applicant must construct and operate its various equipment and processes on a facility basis. | Permits include terms and conditions that specify the general operational requirements of the site; and also include codification of all applicable requirements for emission units at the site. |
| Opportunity for EPA review for Federal Prevention of Significant Deterioration (PSD) and Nonattainment (NA) permits for major sources. | Opportunity for EPA review, Affected states review, and a Public petition period for every FOP. |
| Permits have a table listing maximum emission limits for pollutants | Permit has an applicable requirements table and Periodic Monitoring (PM) / Compliance Assurance Monitoring (CAM) tables which document applicable monitoring requirements. |
| Permits can be altered or amended upon application by company. Permits must be issued before construction or modification of facilities can begin. | Permits can be revised through several revision processes, which provide for different levels of public notice and opportunity to comment. Changes that would be significant revisions require that a revised permit be issued before those changes can be operated. |
| NSR permits are issued independent of FOP requirements. | FOP are independent of NSR permits, but contain a list of all NSR permits incorporated by reference |

New Source Review Requirements

Below is a list of the New Source Review (NSR) permits for the permitted area. These NSR permits are incorporated by reference into the operating permit and are enforceable under it. These permits can be found in the main TCEQ file room,

located on the first floor of Building E, 12100 Park 35 Circle, Austin, Texas. In addition, many of the permits are accessible online through the link provided below. The Public Education Program may be contacted at 1-800-687-4040 or the Air Permits Division (APD) may be contacted at 1-512-239-1250 for help with any question.

Additionally, the site contains emission units that are permitted by rule under the requirements of 30 TAC Chapter 106, Permits by Rule. Permit by Rule (PBR) registrations submitted by permittees are also available online through the link provided below. The following table specifies the PBRs that apply to the site.

The TCEQ has interpreted the emission limits prescribed in 30 TAC §106.4(a) as both emission thresholds and default emission limits. The emission limits in 30 TAC §106.4(a) are all considered applicable to each facility as a threshold matter to ensure that the owner/operator qualifies for the PBR authorization. Those same emission limits are also the default emission limits if the specific PBR does not further limit emissions or there is no lower, certified emission limit claimed by the owner/operator.

This interpretation is consistent with how TCEQ has historically determined compliance with the emission limits prior to the addition of the “as applicable” language. The “as applicable” language was added in 2014 as part of changes to the sentence structure in a rulemaking that made other changes to address greenhouse gases and was not intended as a substantive rule change. This interpretation also provides for effective and practical enforcement of 30 TAC §106.4(a), since for the TCEQ to effectively enforce the emission limits in 30 TAC §106.4(a) as emission thresholds, all emission limits must apply. As provided by 30 TAC §106.4(a)(2) and (3), an owner/operator shall not claim a PBR authorization if the facility is subject to major New Source Review. The practical and legal effect of the language in 30 TAC § 106.4 is that if a facility does not emit a pollutant, then the potential to emit for that particular pollutant is zero, and thus, the facility is not authorized to emit the pollutant pursuant to the PBR.

The status of air permits, applications, and PBR registrations may be found by performing the appropriate search of the databases located at the following website:

www.tceq.texas.gov/permitting/air/nav/air_status_permits.html

Details on how to search the databases are available in the **Obtaining Permit Documents** section below.

New Source Review Authorization References

| Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area. | |
|---|------------------------------|
| Authorization No.: 25875 | Issuance Date: 02/02/2015 |
| Authorization No.: 33577 | Issuance Date: 12/12/2018 |
| Permits By Rule (30 TAC Chapter 106) for the Application Area | |
| Number: 106.183 | Version No./Date: 09/04/2000 |
| Number: 106.261 | Version No./Date: 11/01/2003 |
| Number: 106.262 | Version No./Date: 11/01/2003 |
| Number: 106.352 | Version No./Date: 02/27/2011 |
| Number: 106.359 | Version No./Date: 09/10/2013 |
| Number: 106.492 | Version No./Date: 09/04/2000 |
| Number: 106.512 | Version No./Date: 06/13/2001 |
| Number: 6 | Version No./Date: 05/12/1981 |
| Number: 66 | Version No./Date: 09/12/1989 |
| Number: 105 | Version No./Date: 05/12/1981 |

Emission Units and Emission Points

In air permitting terminology, any source capable of generating emissions (for example, an engine or a sandblasting area) is called an Emission Unit. For purposes of Title V, emission units are specifically listed in the operating permit when they have applicable requirements other than New Source Review (NSR), or when they are listed in the permit shield table.

The actual physical location where the emissions enter the atmosphere (for example, an engine stack or a sand-blasting yard) is called an emission point. For New Source Review preconstruction permitting purposes, every emission unit has an associated emission point. Emission limits are listed in an NSR permit, associated with an emission point. This list of emission points and emission limits per pollutant is commonly referred to as the "Maximum Allowable Emission Rate Table", or "MAERT" for short. Specifically, the MAERT lists the Emission Point Number (EPN) that identifies the emission point, followed immediately by the Source Name, identifying the emission unit that is the source of those emissions on this table.

Thus, by reference, an emission unit in a Title V operating permit is linked by reference number to an NSR authorization, and its related emission point.

Monitoring Sufficiency

Federal and state rules, 40 CFR § 70.6(a)(3)(i)(B) and 30 TAC § 122.142(c) respectively, require that each federal operating permit include additional monitoring for applicable requirements that lack periodic or instrumental monitoring (which may include recordkeeping that serves as monitoring) that yields reliable data from a relevant time period that are representative of the emission unit's compliance with the applicable emission limitation or standard. Furthermore, the federal operating permit must include compliance assurance monitoring (CAM) requirements for emission sources that meet the applicability criteria of 40 CFR Part 64 in accordance with 40 CFR § 70.6(a)(3)(i)(A) and 30 TAC § 122.604(b).

With the exception of any emission units listed in the Periodic Monitoring or CAM Summaries in the FOP, the TCEQ Executive Director has determined that the permit contains sufficient monitoring, testing, recordkeeping, and reporting requirements that assure compliance with the applicable requirements. If applicable, each emission unit that requires additional monitoring in the form of periodic monitoring or CAM is described in further detail under the Rationale for CAM/PM Methods Selected section following this paragraph.

Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected

Compliance Assurance Monitoring (CAM):

Compliance Assurance Monitoring (CAM) is a federal monitoring program established under Title 40 Code of Federal Regulations Part 64 (40 CFR Part 64).

Emission units are subject to CAM requirements if they meet the following criteria:

1. the emission unit is subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement;
2. the emission unit uses a control device to achieve compliance with the emission limitation or standard specified in the applicable requirement; and
3. the emission unit has the pre-control device potential to emit greater than or equal to the amount in tons per year for a site to be classified as a major source.

The following table(s) identify the emission unit(s) that are subject to CAM:

| Unit/Group/Process Information | |
|--|---|
| ID No.: AMINE | |
| Control Device ID No.: TO-1 | Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer) |
| Applicable Regulatory Requirement | |
| Name: 30 TAC Chapter 116, NSR Permits | SOP Index No.: NA |
| Pollutant: VOC | Main Standard: 33577 |
| Monitoring Information | |
| Indicator: Combustion Temperature / Exhaust Gas Temperature | |
| Minimum Frequency: once per day | |
| Averaging Period: n/a | |
| Deviation Limit: Minimum combustion temperature = 1400 F | |
| Basis of CAM: It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for thermal incinerators. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115. | |

| Unit/Group/Process Information | |
|---|---|
| ID No.: C-V-1 | |
| Control Device ID No.: C-TO | Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer) |
| Applicable Regulatory Requirement | |
| Name: 30 TAC Chapter 106, Permits by Rule | SOP Index No.: NA |
| Pollutant: VOC | Main Standard: 106.352 |
| Monitoring Information | |
| Indicator: Combustion Temperature / Exhaust Gas Temperature | |
| Minimum Frequency: once per day | |
| Averaging Period: n/a | |
| Deviation Limit: Minimum combustion temperature = 1400 F | |
| <p>Basis of CAM: It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for thermal incinerators. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.</p> | |

| Unit/Group/Process Information | |
|---|---|
| ID No.: DEHY-1 | |
| Control Device ID No.: TO-1 | Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer) |
| Applicable Regulatory Requirement | |
| Name: 30 TAC Chapter 116, NSR Permits | SOP Index No.: NA |
| Pollutant: VOC | Main Standard: 33577 |
| Monitoring Information | |
| Indicator: Combustion Temperature / Exhaust Gas Temperature | |
| Minimum Frequency: once per day | |
| Averaging Period: n/a | |
| Deviation Limit: Minimum combustion temperature = 1400 F | |
| <p>Basis of CAM: It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for thermal incinerators. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.</p> | |

Periodic Monitoring:

The Federal Clean Air Act requires that each federal operating permit include monitoring sufficient to assure compliance with the terms and conditions of the permit. Most of the emission limits and standards applicable to emission units at Title V sources include adequate monitoring to show that the units meet the limits and standards. For those requirements that do not include monitoring, or where the monitoring is not sufficient to assure compliance, the federal operating permit must include such monitoring for the emission units affected. The following emission units are subject to periodic monitoring requirements because the emission units are subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement that does not already require monitoring, or the monitoring for the applicable requirement is not sufficient to assure compliance:

| Unit/Group/Process Information | |
|--|-----------------------------------|
| ID No.: FL-1 | |
| Control Device ID No.: N/A | Control Device Type: N/A |
| Applicable Regulatory Requirement | |
| Name: 30 TAC Chapter 111, Visible Emissions | SOP Index No.: R1111 |
| Pollutant: Opacity | Main Standard: § 111.111(a)(1)(B) |
| Monitoring Information | |
| Indicator: Visible Emissions | |
| Minimum Frequency: Once per week | |
| Averaging Period: n/a | |
| Deviation Limit: If visible emissions are observed, the permit holder shall report a deviation. | |
| <p>Basis of monitoring:</p> <p>The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.</p> | |

| Unit/Group/Process Information | |
|--|-------------------------------|
| ID No.: T-5 | |
| Control Device ID No.: N/A | Control Device Type: N/A |
| Applicable Regulatory Requirement | |
| Name: 40 CFR Part 60, Subpart GG | SOP Index No.: 60GG |
| Pollutant: NO _x | Main Standard: § 60.332(a)(2) |
| Monitoring Information | |
| Indicator: NO _x ppmv | |
| Minimum Frequency: Quarterly, semi-annually, annually for each full calendar year. If a deviation, then quarterly. | |
| Averaging Period: N/A | |
| Deviation Limit: NO _x less than 42ppmvd. | |
| <p>Basis of monitoring:</p> <p>It is widely practiced and accepted to calibrate and use a portable analyzer or NO_x CEMS/PEMS to measure NO_x concentration with procedures such as EPA Test Method 7. The measured concentration along with stack flow rate or AP-42 factors and fuel consumption records may be used to demonstrate compliance with an underlying emission limit or standard. Additionally, measuring the NO_x concentration is provided as a monitoring option for any control device because an increase in NO_x concentration may be indicative of the control device performance. Outlet NO_x concentration has been used as an indicator in many federal and state rules.</p> | |

| Unit/Group/Process Information | |
|--|-------------------------------|
| ID No.: T-8 | |
| Control Device ID No.: N/A | Control Device Type: N/A |
| Applicable Regulatory Requirement | |
| Name: 40 CFR Part 60, Subpart GG | SOP Index No.: 60GG |
| Pollutant: NO _x | Main Standard: § 60.332(a)(2) |
| Monitoring Information | |
| Indicator: NO _x ppmv | |
| Minimum Frequency: Quarterly, semi-annually, annually for each full calendar year. If a deviation, then quarterly. | |
| Averaging Period: N/A | |
| Deviation Limit: NO _x less than 42 ppmvd | |
| <p>Basis of monitoring:</p> <p>It is widely practiced and accepted to calibrate and use a portable analyzer or NO_x CEMS/PEMS to measure NO_x concentration with procedures such as EPA Test Method 7. The measured concentration along with stack flow rate or AP-42 factors and fuel consumption records may be used to demonstrate compliance with an underlying emission limit or standard. Additionally, measuring the NO_x concentration is provided as a monitoring option for any control device because an increase in NO_x concentration may be indicative of the control device performance. Outlet NO_x concentration has been used as an indicator in many federal and state rules.</p> | |

Obtaining Permit Documents

The New Source Review Authorization References table in the FOP specifies all NSR authorizations that apply at the permit area covered by the FOP. Individual NSR permitting files are located in the TCEQ Central File Room (TCEQ Main Campus located at 12100 Park 35 Circle, Austin, Texas, 78753, Building E, Room 103). They can also be obtained electronically from TCEQ's Central File Room Online (<https://www.tceq.texas.gov/goto/cfr-online>). Guidance documents that describe how to search electronic records, including Permits by Rule (PBRs) or NSR permits incorporated by reference into an FOP, archived in the Central File Room server are available at https://www.tceq.texas.gov/permitting/air/nav/air_status_permits.html

All current PBRs are contained in Chapter 106 and can be viewed at the following website:

https://www.tceq.texas.gov/permitting/air/permitbyrule/air_pbr_index.html

Previous versions of 30 TAC Chapter 106 PBRs may be viewed at the following website:

www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/old106list/index106.html

Historical Standard Exemption lists may be viewed at the following website:

www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/oldselist/se_index.html

Additional information concerning PBRs is available on the TCEQ website:

https://www.tceq.texas.gov/permitting/air/nav/air_pbr.html

Available Unit Attribute Forms

- OP-UA1 - Miscellaneous and Generic Unit Attributes
- OP-UA2 - Stationary Reciprocating Internal Combustion Engine Attributes
- OP-UA3 - Storage Tank/Vessel Attributes
- OP-UA4 - Loading/Unloading Operations Attributes
- OP-UA5 - Process Heater/Furnace Attributes
- OP-UA6 - Boiler/Steam Generator/Steam Generating Unit Attributes
- OP-UA7 - Flare Attributes
- OP-UA8 - Coal Preparation Plant Attributes
- OP-UA9 - Nonmetallic Mineral Process Plant Attributes
- OP-UA10 - Gas Sweetening/Sulfur Recovery Unit Attributes
- OP-UA11 - Stationary Turbine Attributes
- OP-UA12 - Fugitive Emission Unit Attributes
- OP-UA13 - Industrial Process Cooling Tower Attributes
- OP-UA14 - Water Separator Attributes
- OP-UA15 - Emission Point/Stationary Vent/Distillation Operation/Process Vent Attributes
- OP-UA16 - Solvent Degreasing Machine Attributes
- OP-UA17 - Distillation Unit Attributes
- OP-UA18 - Surface Coating Operations Attributes
- OP-UA19 - Wastewater Unit Attributes
- OP-UA20 - Asphalt Operations Attributes
- OP-UA21 - Grain Elevator Attributes
- OP-UA22 - Printing Attributes
- OP-UA24 - Wool Fiberglass Insulation Manufacturing Plant Attributes
- OP-UA25 - Synthetic Fiber Production Attributes
- OP-UA26 - Electroplating and Anodizing Unit Attributes
- OP-UA27 - Nitric Acid Manufacturing Attributes
- OP-UA28 - Polymer Manufacturing Attributes
- OP-UA29 - Glass Manufacturing Unit Attributes
- OP-UA30 - Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mill Attributes

OP-UA31 - Lead Smelting Attributes
OP-UA32 - Copper and Zinc Smelting/Brass and Bronze Production Attributes
OP-UA33 - Metallic Mineral Processing Plant Attributes
OP-UA34 - Pharmaceutical Manufacturing
OP-UA35 - Incinerator Attributes
OP-UA36 - Steel Plant Unit Attributes
OP-UA37 - Basic Oxygen Process Furnace Unit Attributes
OP-UA38 - Lead-Acid Battery Manufacturing Plant Attributes
OP-UA39 - Sterilization Source Attributes
OP-UA40 - Ferroalloy Production Facility Attributes
OP-UA41 - Dry Cleaning Facility Attributes
OP-UA42 - Phosphate Fertilizer Manufacturing Attributes
OP-UA43 - Sulfuric Acid Production Attributes
OP-UA44 - Municipal Solid Waste Landfill/Waste Disposal Site Attributes
OP-UA45 - Surface Impoundment Attributes
OP-UA46 - Epoxy Resins and Non-Nylon Polyamides Production Attributes
OP-UA47 - Ship Building and Ship Repair Unit Attributes
OP-UA48 - Air Oxidation Unit Process Attributes
OP-UA49 - Vacuum-Producing System Attributes
OP-UA50 - Fluid Catalytic Cracking Unit Catalyst Regenerator/Fuel Gas Combustion Device/Claus Sulfur Recovery Plant Attributes
OP-UA51 - Dryer/Kiln/Oven Attributes
OP-UA52 - Closed Vent Systems and Control Devices
OP-UA53 - Beryllium Processing Attributes
OP-UA54 - Mercury Chlor-Alkali Cell Attributes
OP-UA55 - Transfer System Attributes
OP-UA56 - Vinyl Chloride Process Attributes
OP-UA57 - Cleaning/Depainting Operation Attributes
OP-UA58 - Treatment Process Attributes
OP-UA59 - Coke By-Product Recovery Plant Attributes
OP-UA60 - Chemical Manufacturing Process Unit Attributes
OP-UA61 - Pulp, Paper, or Paperboard Producing Process Attributes
OP-UA62 - Glycol Dehydration Unit Attributes
OP-UA63 - Vegetable Oil Production Attributes